

2nd Amendment

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

Jesse Daniel Roberts,
Tiffany Lashae Roberts) Plaintiff(s),
v. Amendment to list) Case Number 2:24-cv-00052
Samantha Franks) Judge Weverly D. Crenshaw
Defendant(s)) Magistrate Judge
Park West Media Amendment) cause 42 1983

Injunctive & Damages

* Defendant Samantha Franks does know the
(Type of Pleading) 7W 37921

On November 21, 2022 Samantha
Franks did in fact violate Jesse Roberts,
Tiffany Roberts, and Trayton Roberts
clearly established rights, 4th, 14th &
8th amendments to the United States
Constitution. Samantha Franks acting
under color of the law became a
willing participant in this conspiracy on
11/21/2022 where as her conduct
was that of a leader organized
to deprive these parents of their
clearly established rights to have control
and custody of their Newborn child
Trayton D. Roberts. She took part in

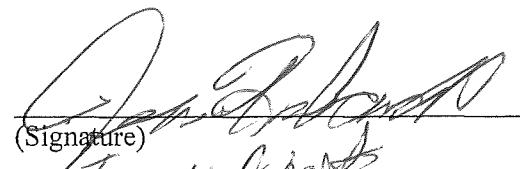
the kidnapping of T.O.R. all acting under color of the law. She violates the aforementioned 14th Amendment right to due process; and moreover, violates Jesse Robards 4th Amendment rights against illegal search & seizure as clearly established right.

Jesse Robards
Tamara Robards

Park West Medical Center
9852 Park West Blvd
Knoxville TN 37923
PM(865) 373-1000

On November 21, 2022 Park West Medical Center deprives Jesse David Robards & Tamara Keisha Robards in addition Trajan D. Robards of their clearly established 4th & 14th Amendment right by entering into this conspiracy against these parent willingly that deprives parent of their clearly established rights to have control & custody of their child.

Jesse M.
Jesse M. Robards


(Signature)

Tamara Roberts
(Print Name)

Jesse O. Roberts
Tamara L. Roberts

510 Country Wood Lane
(Address & Telephone Number, if any)

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